



June 16, 2011

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

On Tuesday, June 14, 2011, Eric Einhorn and Mike Rhoda (Windstream), Kathy Grillo (Verizon), Hank Hultquist (AT&T) and the undersigned met with Zachary Katz (Office of Chairman Genachowski), Michael Steffen (Office of the General Counsel), Sharon Gillett, Carol Matthey, Rebekah Goodheart and Amy Bender (Wireline Competition Bureau). Our discussion focused on a potential framework for measured reform away from the current inter-carrier compensation system and towards a forward-looking and sustainable system. That reform would consist of a set of steps to harmonize and reduce inter-carrier rates. As inter-carrier revenues fall due to rate reductions, this potential framework would provide companies an opportunity to recover these revenues from other sources – including, in part, from an explicit fund – for some period of time. In addition, we discussed steps to reduce current levels of arbitrage and how to account for the effect these steps would be likely to have on inter-carrier revenues.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks".

Jonathan Banks

c: Zachary Katz
Michael Steffen
Sharon Gillett
Carol Matthey
Rebekah Goodheart
Amy Bender